

Who is the data controller of my personal data?

The personal data controller shall be **FLYTRONIC S.A.** seated in Gliwice at ul. Bojkowska 43 (44–100), hereinafter referred to as **FLYTRONIC S.A.**

What personal data shall be processed by the Data Controller?

As the personal data controller according to the GDPR, **FLYTRONIC S.A.** shall process the following personal data, among others:

- **Personal data of job candidates** (details that the candidates provide to the data controller as part of their participation in the recruitment processes – in particular, the details included in the resume)
- **Personal data of contractors and their representatives** (data of companies* and contact persons – the general data used to issue and post invoices (name, NIP [Tax Identification Number], business address) and for contracts (name, surname, company name, position, e-mail address, phone number))
- **Personal data of the Data Controller's attorneys** (the range of data shall include, where appropriate, name, surname, PESEL [Personal Identification Number] or/and identity card number, job title and business contact details)
- **Persons submitting inquiries through the contact form, via e-mail and by phone** (general contact details (name, surname, e-mail address) provided by persons due to inquiries sent to the data controller)
- **Personal data processed as part of profile management on social media, i.e., LinkedIn, Facebook**

* – Company data shall be considered as personal data only in a situation when such data allows for identification of the data subjects. Data of corporations shall not be considered as personal data.

* – GDPR = Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (general data protection regulation)

What are the rules under which the Data Controller shall process my personal data?

Below, you will find the rules of processing of your personal data (particularly with an explanation about the parties with access to the personal data, the duration of the retention period, as well as the basis for the processing).

Personal data of job candidates

- The rules of processing of job candidates' personal data have been presented in the information clauses provided under the job postings / forms based on which you are able to send us your job application.

Personal data of contractors and their representatives

- **The purpose of and basis for the data processing: Personal data of contractors** shall be processed for the purposes of performance of contracts concluded between parties (pursuant to Art. 6 section 1 letter b of the GDPR – the processing is required for performance of contracts which you are a party of) and fulfilment of obligations imposed on the data controller under the applicable regulations of law (pursuant to Art. 6 section 1 letter c of the GDPR – the processing is required to fulfil the legal obligation imposed on the data controller (particularly within the scope of issuance and storage of VAT invoices)), arising, among others, from the Accounting Act and the Act on VAT. **Personal data of contractors' representatives** shall be processed for contractual purposes, including conclusion and performance of contracts (pursuant to Art. 6 section 1 letter f of the GDPR – processing is necessary for the purposes of the data controller's legitimate interests, namely providing a contract with the contractor and ensuring performance of contracts concluded with contractors) as well as in order to fulfil the obligations imposed on the data controller under the applicable regulations of law (Art. 6 section 1 letter c of the GDPR). **Personal data of contractors and their representatives** can also be processed in order to eventually pursue as well as defend claims (the basis of the data

processing shall be Art. 6 section 1 letter f of the GDPR – a legitimate interest of the data controller, i.e., pursuit of and defence against claims).

- **Data recipients:** The data in question may be disclosed to entities authorized by law. Access to data under relevant personal data processing agreements can also be granted to entities that support **FLYTRONIC S.A.** within the scope of the objectives specified above.
- **Data retention period:** Personal data of contractors and their representatives shall be stored for a period required under the applicable regulations of law or/and until the realization of the purposes specified above, whichever of the events occurs later.
- **Data transfer to a third country:** As a general rule, **FLYTRONIC S.A.** does not transfer data outside the European Economic Area (hereinafter referred to as the EEA). However, there might be situations when the personal data processing will involve entities the headquarters/servers of which may be located outside the EEA. In such cases, the data shall be transferred under contractual clauses approved by the European Commission or the data transfer shall be carried out on a different basis described in Art. V of the GDPR (e.g., a decision of the European Commission on the adequate level of protection in a given country).
- **Automated decision-making / profiling:** **FLYTRONIC S.A.** shall not make decisions based on automated processing, including profiling (with regard to the purposes of data processing described above).
- **Voluntary / obligatory provision of data:** Provision of personal data is voluntary. However, it is necessary to carry out the business relationship with **FLYTRONIC S.A.** and perform the binding contracts.

Personal data of the Data Controller's attorneys

- **The purpose of and basis for the data processing:** Personal data is processed for the purpose of granting power-of-attorney and its archiving, as well as for the eventual determination, pursuit or/and defence of claims, which constitutes a legitimate interest of the data controller (Art. 6 section 1 letter f of the GDPR).
- **Source of data | Voluntary / obligatory provision of data:** Your personal data have been directly obtained from you or your employer/ordering party (the scope of data includes, where appropriate, name, surname, PESEL [Personal Identification Number] or/and identity card number, job title and business contact details). If the data is obtained directly from you, provision of such data is voluntary but it is, however, necessary for **FLYTRONIC S.A.** to grant the power-of-attorney.
- **Data recipients:** The data in question may be disclosed to entities authorized by law. Access to data under relevant agreements can also be granted to entities which support **FLYTRONIC S.A.** within the scope of IT services and other entities supporting **FLYTRONIC S.A.** as part of performance of the objectives described in the paragraph "The purpose of and basis for the data processing" (in particular: couriers, third-party auditors).
- **Data retention period:** Personal data shall be stored until the expiry of claims.
- **Automated decision-making / profiling:** **FLYTRONIC S.A.** shall not make decisions based on automated processing, including profiling (with regard to the purposes of data processing described above).
- **Data transfer outside the EEA:** As a general rule, **FLYTRONIC S.A.** does not transfer personal data outside the European Economic Area.

Persons submitting inquiries through contact forms, via e-mail or by phone

- **The purpose of and basis for the data processing:** Personal data shall be processed for the purposes of electronic correspondence and in order to perform actions undertaken at your request (the basis of the processing shall be the data controller's legitimate interest, namely handling electronic correspondence and performing actions undertaken at the request of data subjects).
- **Data recipients:** The data in question may be disclosed to entities authorized by law. Access to data under relevant personal data processing agreements can also be granted to entities that support **FLYTRONIC S.A.** within the scope of the objectives specified above.
- **Data retention period:** Personal data shall be stored for a period required under the applicable regulations of law or/and until the realization of the purposes specified above, whichever of the events occurs later.
- **Data transfer to a third country:** As a general rule, **FLYTRONIC S.A.** does not transfer data outside the European Economic Area (hereinafter referred to as the EEA). However, there might be situations when the personal data processing will involve entities the headquarters/servers of which may be located outside the EEA. In such cases, the data shall be transferred under contractual clauses approved by the European Commission or the data transfer shall

be carried out on a different basis described in Art. V of the GDPR (e.g., a decision of the European Commission on the adequate level of protection in a given country).

- **Automated decision-making / profiling:** FLYTRONIC S.A. shall not make decisions based on automated processing, including profiling (with regard to the purposes of data processing described above).
- **Voluntary / obligatory provision of data:** Provision of personal data is voluntary. However, it is required in order to exchange electronic correspondence and undertake actions at your request.

Personal data processed as part of profile management on social media, i.e., LinkedIn, Facebook

Personal data controllers: The data controllers of the personal data processed on LinkedIn and Facebook shall also be the entities that run the websites in question:

- LinkedIn Ireland Unlimited Company which processes your personal data under rules described [here](#).
- Facebook Ireland Ltd which processes your personal data under rules described [here](#).

hereinafter jointly referred to as “Websites”

The purpose of and basis for the data processing: FLYTRONIC S.A. shall process your personal data in order to manage profiles on websites, particularly in order to publish posts, hold discussions in the comments, communicate in form of private messages and, in justified cases, also to pursue and defend claims. Such activities shall constitute a legitimate interest of FLYTRONIC S.A. (Art. 6 section 1 letter f of the GDPR) which constitutes the basis for the processing of your personal data.

Data recipients: In case of publishing posts/holding discussions, the access to such data shall also be given to FLYTRONIC S.A. employees, the websites as well as other persons and entities mentioned in the privacy policies of the websites. References to the indicated privacy policies have been specified in section “Personal data controllers”.

Data retention period: Your personal data shall be stored for the period defined in the privacy policies of the websites.

Data transfer to a third country: As a general rule, FLYTRONIC S.A. does not transfer data outside the European Economic Area (hereinafter referred to as the EEA). However, in specific cases, the Websites may disclose personal data outside the EEA according to the rules that you can familiarize yourself in under the links provided in section: “Personal data controllers” above.

Automated decision-making / profiling: FLYTRONIC S.A. shall not make decisions based on automated processing, including profiling (with regard to the purposes of data processing described above).

Voluntary / obligatory provision of data: Provision of personal data is voluntary. However, it is necessary to add comments/send private messages to FLYTRONIC S.A./use other features of the websites.

What are my rights due to the processing of my personal data by FLYTRONIC S.A.?

Where appropriate, you shall have the right to:

- demand access to your personal data and to demand a correction, removal or restriction of processing thereof, as well as to transfer your data;
- revoke the granted consent at any time (if such consent is granted). Revocation of the consent shall not affect the lawfulness of processing carried out under such consent before its revocation.
- file an objection against the processing of your personal data;
- file a complaint to the supervisory authority (President of the Personal Data Protection Office).

To whom should I address questions concerning the processing of my personal data and in order to exercise my rights?

All inquiries and declarations within the scope of the above rights should be addressed to the following contact details:

Contact details of the data controller:

FLYTRONIC S.A., ul. Bojkowska 43, 44-100 Gliwice

E-mail address: rodo@flytronic.pl